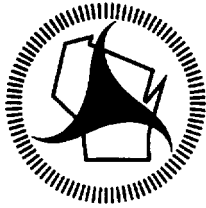


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Wisconsin Department of Transportation

Division of Transportation Infrastructure Development

Bureau of Highway Operations
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May 31, 2002

U.S. Department of Transportation
Dockets Management Facility
Room PL-401
400 Seventh Street, SW.
Washington, DC 20590

RE: FHWA Docket No. FHWA-2001-11130 - 27
RIN 2125-AE29
Work Zone Safety

DEPT. OF TRANSPORTATION
DOCKETS
02 JUN - 6 PM 3:58

I am writing on behalf of the Wisconsin Department of Transportation (WisDOT) with comments on the advance notice of proposed rulemaking on work zone safety. My comments are grouped into the categories outlined in the Federal Register notice.

General

We agree there should be a national policy to promote improved mobility and safety during highway construction and maintenance. Because each construction and maintenance project has varying characteristics, national policy should be provided in the form of guidance and best practices rather than regulation. The issues of mobility and road user impact are not currently addressed in 23 CFR 630, subpart J. Future policies that address these issues should be stratified according to the following factors: duration of work, lanes affected, average daily traffic, expected capacity reduction, and potential impacts on the local network and businesses.

A common national definition for work zone would be desirable. We support either the American National Standards Institute (ANSI) D16 proposal or the Manual on Uniform Traffic Control Devices (MUTCD) definition plus the statement, "A work zone may be for short or long duration and may include stationary or moving activities. Work zones may or may not involve workers or equipment near the road."

In addition we suggest a review of how the MUTCD definitions for work duration affect the traffic control devices to be used at a site. Specifically, MUTCD Section 6G.02 includes nighttime work lasting more than 1 hour in the definition of intermediate-term work, and Section 6F.65 states, "Pavement markings shall be maintained...in all...intermediate-term temporary traffic control zones." We believe it is not practical to alter pavement markings for every night work operation lasting more than 1 hour.

Transportation Planning and Programming

When developing transportation plans, WisDOT considers impacts on road users by doing the following: 1) coordinating project schedules to avoid construction on alternate routes simultaneously, 2) avoiding construction activities during peak travel periods, and 3) planning and funding congestion mitigation measures.

To support better decisions on project scheduling and staging, more documentation of the costs of nighttime work compared to daytime work is needed.

Project Design for Construction and Maintenance

User cost can be a useful measure in evaluating alternative work zone design and implementation strategies. When evaluating alternatives, we believe user cost should be given moderate weight in comparison with other decision-making factors. Delay, speed, travel time, worker safety and constructability should all be considered.

Regarding utility delays, Wisconsin has an administrative rule that spells out a timeline for utility work on roadway projects. This rule leads to proper utility coordination prior to letting the project and has significantly reduced utility delays.

Managing for Mobility and Safety in and Around Work Zones

Traffic control plans (TCP's) should include consideration of Intelligent Transportation Systems (ITS), traveler information, traffic and speed management, incident and emergency management, and security aspects. To facilitate such considerations, it would be helpful to have guidelines on when and to what extent it is appropriate to invest in ITS, traffic management and extraordinary enforcement. These guidelines should be based on factors such as estimated delays, user cost, average daily traffic and project duration.

We believe the primary responsibility for developing TCP's should remain with the state DOT's and municipalities. As a result, it should not be necessary to require the TCP developer to be certified or to require mobility and safety audits for work zones. Contractors may propose alternative staging and methods for approval by the owner. Resulting cost savings should be shared between the owner and contractor.

Public Outreach and Communications

State and local government and the contractor should share the responsibility to inform the public. Projects with substantial disruption should include a public communication plan. The plan should include components for education and outreach about the project and alternate means of travel that are available. The plan may involve news media outreach, paid media time, websites, brochures, public meetings, and use of changeable message signs and advisory radio.

Analyzing Work Zone Performance

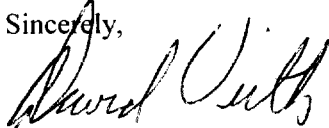
While it is valuable to conduct project evaluations and share best practices, we do not believe agencies should be mandated to report statistics on work zone characteristics or mobility performance. Considering the sheer number of work zones and agencies involved, a requirement to

report such statistics would impose an unreasonable burden on numerous agencies. Also, many of these statistics would be difficult to measure.

Currently used measures for safety are useful in tracking work zone safety trends. However, individual crashes and contributing factors need to be analyzed in order to identify common causes and whether improvements to work zone devices, layouts and methods are needed. A common reporting definition of a work zone crash should be developed.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "David Vieth". The signature is fluid and cursive, with the first name "David" and last name "Vieth" clearly distinguishable.

David Vieth, Director
Bureau of Highway Operations

Cc: Gary Whited, DTID Administrator
Marianne Haag, OGC (Tracking No. FR02-007)